

Ahilan T. Arulanantham (SBN 237841)
arulanantham@law.ucla.edu
CENTER FOR IMMIGRATION LAW AND
POLICY, UCLA SCHOOL OF LAW
385 Charles E. Young Dr. East
Los Angeles, CA 90095
Telephone: (310) 825-1029

Emilou MacLean (SBN 319071)
emaclean@aclunc.org
Michelle (Minju) Y. Cho (SBN 321939)
mcho@aclunc.org
Amanda Young (SBN 359753)
ayoung@aclunc.org
ACLU FOUNDATION
OF NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111-4805
Telephone: (415) 621-2493
Facsimile: (415) 863-7832

Attorneys for Plaintiffs
[Additional Counsel Listed on Next Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, DENIS
MOLINA, JHONY SILVA, MARIA ELENA
HERNANDEZ, O.C., SANDHYA LAMA,
S.K., TEOFILO MARTINEZ,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-05687-TLT

**DECLARATION OF P.C. IN SUPPORT OF
PLAINTIFFS' MOTION FOR PARTIAL
SUMMARY JUDGMENT**

Assigned to: Hon. Trina L Thompson

Date: November 18, 2025

Time: 2:00 p.m.

Place: Courtroom 9

Complaint Filed: July 7, 2025

1 Additional Counsel for Plaintiffs

2 Jessica Karp Bansal (SBN 277347)

3 jessica@ndlon.org

4 Lauren Michel Wilfong (Admitted *Pro Hac Vice*)

5 lwilfong@ndlon.org

6 NATIONAL DAY LABORER ORGANIZING NETWORK

1030 S. Arroyo Parkway, Suite 106

7 Pasadena, CA 91105

8 Telephone: (626) 214-5689

9 Eva L. Bitrán (SBN 302081)

10 ebitran@aclusocal.org

11 Diana Sánchez

12 dianasanchez@aclusocal.org

13 ACLU FOUNDATION

14 OF SOUTHERN CALIFORNIA

15 1313 West 8th Street

16 Los Angeles, CA 90017

17 Telephone: (213) 977-5236

18 Erik Crew (Admitted *Pro Hac Vice*)

19 ecrew@haitianbridge.org

20 HAITIAN BRIDGE ALLIANCE

21 4560 Alvarado Canyon Road, Suite 1H

22 San Diego, CA 92120

23 Telephone: (949) 603-7411

DECLARATION OF P.C.

I, P.C., declare:

1. I have personal knowledge of the facts set forth in this declaration. If called upon to testify as a witness, I could do so and would testify to these facts.

2. I am a citizen of Nepal. I came to the United States at the age of 19 in 2008. I am now 36 years old, and have lived in the United States for 17 years. I have had Temporary Protected Status (TPS) since Nepal was designated for TPS in 2015.

3. I am a member of the National TPS Alliance (NTPSA), and joined voluntarily because I believe in the mission of the organization to defend all TPS holders.

Background and Impact of TPS

4. I was born and raised in Chitwan, Nepal, and came to the United States to pursue a degree in Management Information Systems. I completed my associates degree between 2008 and 2010, then participated in the Optional Practical Training (OPT) program for two years, which provided me authorization to work in the United States temporarily following the completion of my studies. From 2013 to 2015, I continued my education and earned my bachelor's degree.

5. After moving to the United States, I met my husband, who is also from Nepal, and we married in 2010. Shortly after our marriage, we applied for asylum and were waiting for a decision on our asylum applications when Nepal was designated for TPS in 2015. We were extremely grateful to be able to enroll in TPS while our asylum application was still pending. In 2021, we were notified that our asylum application had been denied. Thankfully, we were already protected under TPS and could rely on that status to remain in the United States.

6. My husband and I have lived in Florida since 2015. I used to work as a quality analyst engineer, but in 2022, I quit my job to take care of my children. My daughter is eight, and my son is five, and they are both U.S. citizens. My son also has autism, and requires specialized care, which also prevents me from working a full-time job.

7. Because of TPS, my husband was able to work as a database administrator (DBA) and make enough money to support our whole family, so that I could focus on taking care of our children.

Effect of Loss of TPS

8. When my husband and I found out that the Trump administration was ending TPS for Nepal, we were devastated and emotionally shattered. The uncertainty about our future in the United States caused us tremendous stress and anxiety. We've been here in the community for a long time, and contributing to the economy. This has been our home. My husband and I didn't sleep for many weeks because we were so emotionally broken, constantly worrying about our safety, our children's stability, and what would happen to our family.

9. Since the August 20 termination of TPS for Nepal, both my husband and I have lost our immigration status. As a result, my husband is no longer able to work, and we have also lost our health insurance, which he had been providing for all of us. This was especially heartbreaking because my son, who has autism, had been receiving essential therapies through that insurance, and he is no longer able to receive them. Losing those services was devastating for us as parents, as we watched our child lose access to the support he truly needed.

10. I cannot imagine returning to Nepal with our children because our entire life is here in the United States. I am especially concerned about what the impact of having to return to Nepal would be on my autistic son. He is a very selective eater, as is common for children on the spectrum, and only eats specific foods that would be extremely difficult, or impossible, to find in Nepal. He also requires a specialized school program and ongoing care from a speech therapist, occupational therapist, developmental pediatrician, and neurologist, all of whom have experience working with children with autism. These kinds of services are extremely limited or entirely inaccessible in Nepal.

11. In addition, my son suffers from multiple environmental allergies, including allergies to dust and trees, which further increase his risk for other health issues. I cannot take the chance of putting his health and development at risk. As his mother, I am committed to giving him the best care and support possible, and I truly believe that can only happen here in the United States. It would be devastating for me to have to deprive him of that, particularly since he is a U.S. citizen himself.

12. I also cannot even bear the thought of being separated from my children. My son is non-verbal and completely relies on me to understand and communicate his needs. I know how to read his behaviors, interpret his emotions, and advocate for him. Even my husband often struggles to

1 understand him the way I can. My presence is essential to his daily life and well-being as I serve as
2 his primary bridge to the world, helping him express his emotions, needs, and daily routines.

3 13. Losing TPS has also deeply affected my daughter. Although she is only eight years
4 old, she is very aware of the stress this situation has brought into our lives. She often asks why we
5 can't travel, why we stay home so much, and why we are always so worried. She was recently
6 accepted into a private school that she was very excited about but we were unable to complete her
7 enrollment because we no longer had a valid ID or the legal proof of status required for school
8 admission. She was devastated when she realized she wouldn't be able to attend. It was
9 heartbreaking to see both of my children affected by our situation – one losing access to essential
10 therapies and the other missing an important educational opportunity.

11 14. Since we lost our health insurance, I have not been able to continue my regular
12 medical follow-up appointments. I was previously scheduled to see my doctor every three months to
13 monitor my high cholesterol, but without insurance, I can no longer afford those visits or
14 medications. This has caused me to constantly worry about my health. The thought of something
15 happening to me terrifies me, because I don't know how my autistic son would cope or who would
16 be able to support him the way I do. The fear of being unable to care for him has been overwhelming
17 and makes me anxious every day.

18 15. I have always been an active and engaged member of our community here in Florida.
19 I am involved in several advocacy groups that support parents of children with autism, and I am
20 deeply passionate about connecting with other parents, sharing resources, and helping them navigate
21 the complexities of the school and medical systems. Through this work, I have found a sense of
22 purpose, and I believe I am making a meaningful impact on the lives of others. I want nothing more
23 than to continue contributing to this community that I've come to love, especially for my son's sake
24 and for the other families who rely on these support networks.

25 16. The thought of being forced to leave everything behind and disrupt the life we've
26 built here is devastating. I feel as though the very things that give me hope and strength are being
27 taken from me.

28 17. I wanted to be a part of this lawsuit because there are so many people in the Nepali

1 community who rely on TPS. I want to speak out not just for myself, but for my fellow community
2 members, especially other parents who have children with special needs.

3
4 I declare under penalty of perjury that the foregoing is true and correct, and that this
5 declaration was executed in Florida on this 13th day of October, 2025.

6 P.C.

7
8 P.C.